

From: Denise Tsuji
To: Peter Ruttan
CC: Rizgar Ghazi
Date: 06/20/12 04:24PM
Subject: Fwd: Exide RCC
Attachments: Exide RCC

Hi Peter,

I sent the attached to Rizgar and got his our of office message. As identified in his note, This e-mail is related to EI's for EPA.

Let me know if you need anything else.
Thanks Denise

**Exide Corporation, SF Service Center, 286 Lawrence Ave, South SF,
CA, CAD046000931**

CONSTRUCTION COMPLETE

RCRA Corrective Action Assessment of CA550

(Remedy Construction Complete)

Basis for Approval

Facility Location and Brief Background - The Exide Corporation (Exide) operated warehouse sales outlet and repair shops for industrial-use lead-acid batteries from about 1970 to 1986. The facility was located at 286 Lawrence Avenue, in a predominately commercial/industrial of San Francisco, California. Batteries were routinely opened and drained of their electrolyte (a sulfuric acid solution with dissolved lead). Batteries were either repaired or classified as scrap and sent off-site to a smelter for recovery of the lead. The drained electrolyte was temporarily stored in an underground concrete sump pit, and pH neutralized prior to discharge into the local sanitary sewer system.

Surface Water - Surface water down-gradient of the site are not used as drinking water source. The San Francisco Bay is located east-southeast about 1000 feet from the Exide facility. Colma Creek lies approximately 1700 feet west of the Exide facility.

Hydrogeology - Groundwater beneath the Exide facility is first encountered at a depth of approximately five feet below the ground surface and generally flows east to northeast. A groundwater gradient beneath the site has been calculated to be 0.005 feet/feet. There are ten public drinking water wells within four miles of the site, with the nearest groundwater supply well located more than one from the site.

RCRA Permitting and Closure - Exide submitted a Part A RCRA Hazardous Waste Facility Permit Application to the U.S. EPA in November 1980. On March 30, 1981, the State of California, Department of Health Services (DHS) issued an Interim Status Document. In January 1987, EPA approved the closure plan for the acid neutralization sump pit system (see SWMU 1 below) and the outdoor battery storage area (see SWMU 2 below). On December 29, 1986, DHS issued a letter with the finding that the closure requirements for the regulated units had been met.

A work plan to investigate groundwater and assess/remediate lead impacted soil was submitted to DTSC on August 20, 1992. The investigations revealed groundwater had not been impacted by on-site activities. Remediation of soil impacted by lead was completed in 1993. The final closure certification letter was dated March 8, 1995. DTSC certified closure activities were complete April 6, 1995.

RCRA Facility Assessment - In December 2000 DTSC prepared a RCRA Facility Assessment (RFA) for the Exide facility. The RFA identified the following solid waste management units (SWMUs), which are listed and described briefly below.

- **SWMU 1, Sump Pit System** - This sump pit system consisted of three concrete and epoxy coated sumps, used for neutralizing of electrolyte from batteries prior to discharge into the sanitary sewer system.
- **SWMU 2, Outdoor Battery Storage Area** - This SWMU consisted of an uncovered portion of the asphalt paved parking lot in the south western corner of the facility. It was used to store used and scrap industrial batteries before their disposal.
- **SWMU 3 West Strip** - The West Strip was area at the facility where a strip of land measured approximately eight feet wide by 100 feet long. It was segregated into two separate, smaller strips of land where the lead accumulated.
- **SWMU 4 South Strip** - Lead contaminated soils were found at this SWMU located adjacent to and south of the Outdoor Battery Storage Area (SWMU 2).

The SWMUs were remediated by removal of the contaminated soil and closed under the authority of DTSC. As a result of the remediation activity, there was no need for further action at this facility under RCRA Corrective Action. The Human Health and the Contaminated Ground Water under Control Els were met previously in April, 2000. The criteria for a RCRA Construction Complete determination have been met for this facility.

REFERENCES

- Ecology and Environment, Inc. *Environmental Priorities Initiative Preliminary Assessment: RCRA Preliminary Assessment*, Exide San Francisco Service Center, CAD046000931. Prepared for United States Environmental Protection Agency Region 9. October 3, 1991.
- Groundwater Technology, Inc. Letter to Mr. Matt Love, Exide Corporation, SUBJECT: Project Status Letter Former Exide Facility 286 Lawrence Avenue South San Francisco, California. March 31, 1993.
- Groundwater Technology, Inc. *Project Report Subsurface Investigation and Remedial Action Former Exide Battery Facility 286 Lawrence Avenue South San Francisco, California*. June 4, 1993.
- Groundwater Technology, Inc. Letter from Deborah Horner and David R Kleesattel to Mr. Matt Love, Exide Corporation describing additional EPA requested groundwater investigation at the former Exide Corporation facility. September 21, 1993.
- Luce, Forward, Scripps Attorneys. Letter to Mr. Raymond Saracino United State Environmental Protection Agency - Region IX. February 24, 1994.
- Safety Specialists, Inc. *Closure Plan for Exide Battery*. July 24, 1986.
- Safety Specialists, Inc. *Amended Closure Plan for Exide Battery*. August 26, 1986.
- Safety Specialists, Inc. *Interim Closure Report for Exide Battery*. November 10, 1986.
- Safety Specialists, Inc. Closure Certification Letter to Mr. Mike James, Department of Health Services, for the inside of the Exide facility. December 19, 1986. Safety Specialists, Inc. Letter to Mr. Bill Pallies submitting a revised proposal to conduct additional site cleanup at the former Exide Corporation facility. July 1, 1987.
- Safety Specialists, Inc. Letter to Mr. Bill Pallies submitting a report documenting the subsurface hydrogeologic investigation at the former Exide facility. June 1, 1988.
- Safety Specialists, Inc. *Work Plan Site Closure Activities and Additional Investigation for the former Exide Battery Facility*. August 20, 1992.
- State of California, Department of Health Services (DHS). *Interim Status Document for Exide San Francisco Service Center (CAD 046000931)*. March 30, 1981.
- State of California, Department of Health Services. Letter from Charles A White to Marv Moersfelder, Exide Corporation. May 11, 1983.
- State of California, Department of Health Services. Letter from Michael R. James to Don Dalke, Regional Water Quality Control Board requesting comments or concurrence with approval of closure of underground tank. December 15, 1986.
- State of California, Department of Health Services. Letter from Michael R. James, P. E. to Mr. Ken Van De Riet acknowledging receipt of the Closure Certification Letter dated December 19, 1986. December 29, 1986.
- State of California Department of Health Services. Letter from Virginia Lasky to Mr. Pallies accepting a cleanup level for lead of 500ppm. June 9, 1987.
- State of California Environmental Protection Agency, Department of Toxic Substances Control. Letter from Michael Horner to Matthew Love, Exide Corporation notifying that the Department considers the facility closed. January 26, 1994.
- State of California Environmental Protection Agency, Department of Toxic Substances Control. Letter from Lester Kaufman, Chief Facility Permitting Branch to Matt Love, Exide Corporation approving closure certification for Exide Corporation CAD 046000931. April 6, 1995.

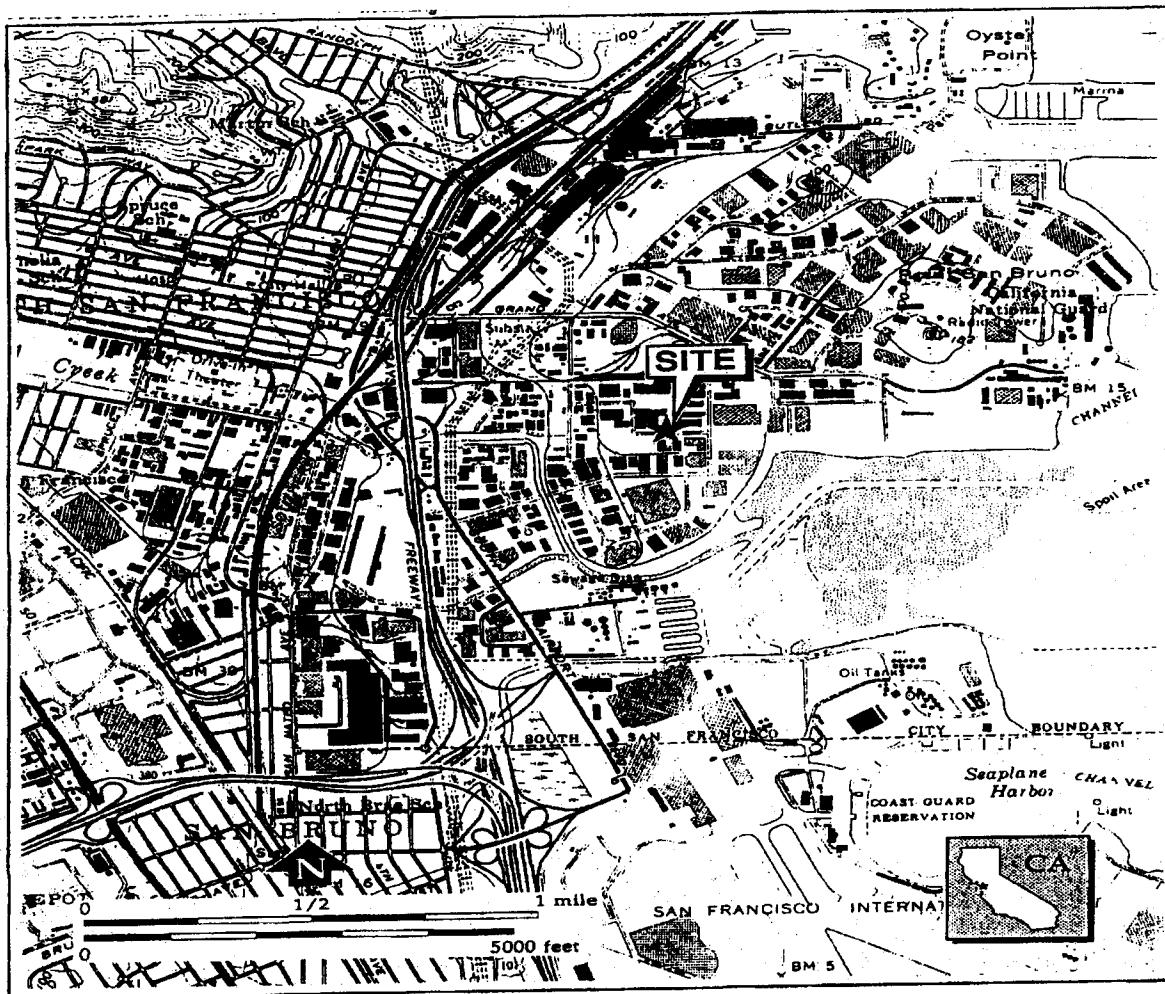
State of California Environmental Protection Agency, Department of Toxic Substances Control, *RCRA Facility Assessment for Exide Corporation South San Francisco Service Center 286 Lawrence Avenue South San Francisco, California, CAD046000931*. December 2000.

United States Environmental Protection Agency Region 9. Letter from Judith Ayers, Regional Administrator to Bill Pallies, Exide Corporation approving the Closure Plan for underground neutralization tank and scrap battery storage area. January 22, 1987.

United States Environmental Protection Agency Region IX. Letter from Raymond Saracino to Mor. Matthew Love, Exide Corporation regarding voluntary action at the former Exide facility. April 15, 1993.

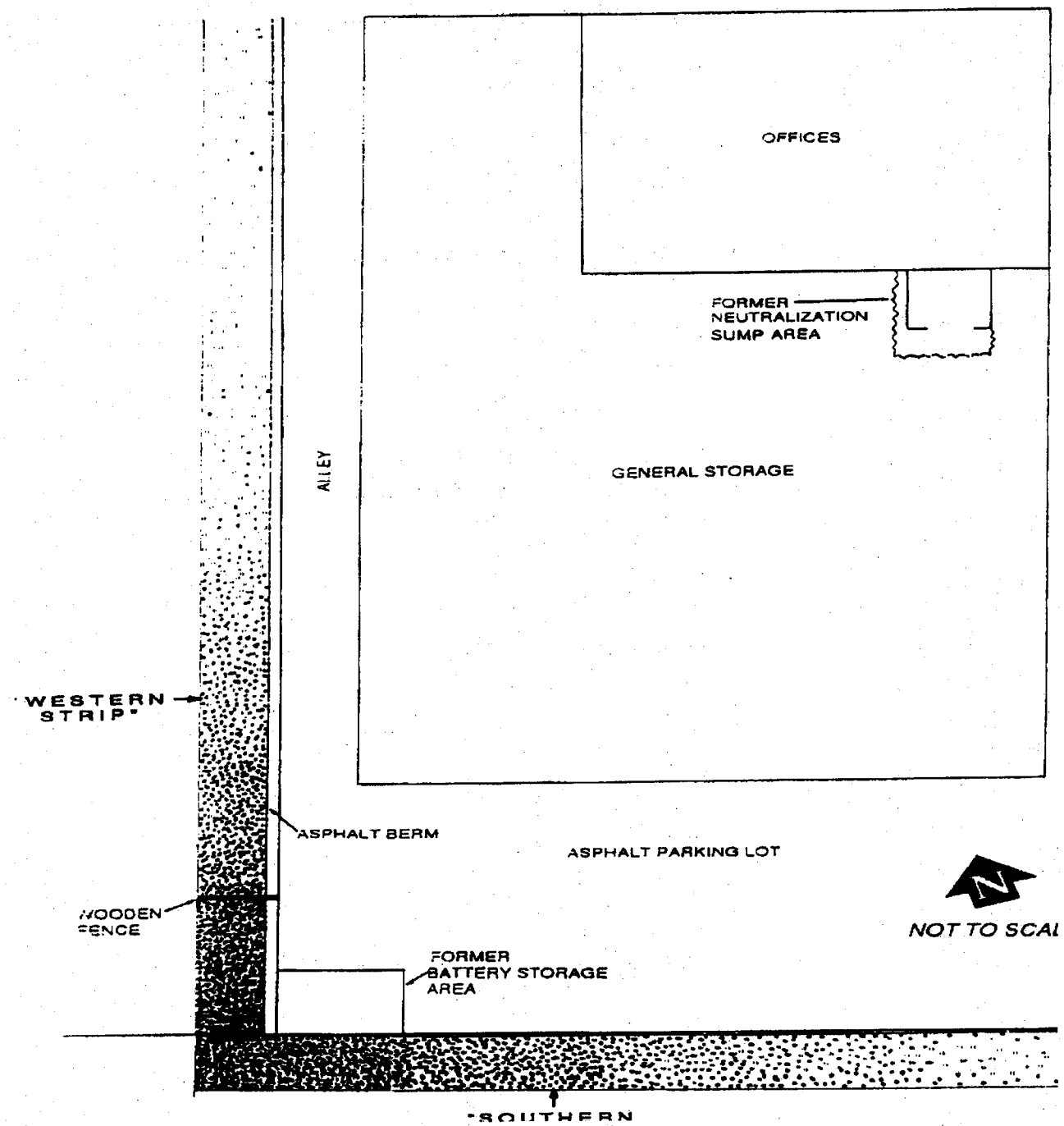
United States Environmental Protection Agency Region IX. Exide Sampling Plan. June 18, 1993.

United States Environmental Protection Agency Region IX. Letter from Raymond Saracino to Jon K. Wactor, Esq., Luce, Forward, Hamilton & Scripps regarding Exide Corporation Facility -South San Francisco, CA (CAD046000931). March 4, 1994.



SITE LOCATION MAP, EXIDE San Francisco Service Center, 286 Lawrence Avenue, San Francisco, CA

FACILITY MAP, EXIDE San Francisco SERVICE CENTER, 286 Lawrence Avenue, San Francisco, California



CONSTRUCTION COMPLETE

US EPA Region 9 GPRA Measure Signature Page RCRA Corrective Action Assessment of CA550 (Remedy Construction Complete)

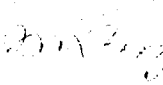
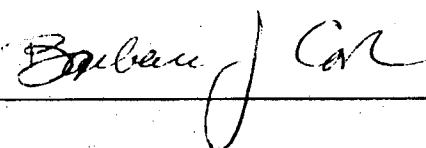
Facility Name	Exide Corporation, SF Service Center
Facility Address	286 Lawrence Ave, South SF, CA
U.S. EPA ID#	CAD046000931

To get an overall YES determination for the "Construction Complete" milestone, ALL final remedy decisions and ALL remedy construction necessary for protection of human health and the environment must be made for ALL portions of the site, completely installed and operating according to specifications stated in the remedy decision documents or approved work plans.

Remedy Construction Completed (Site-wide) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Remedy Construction Complete determination for remedial activities overseen by: <input type="checkbox"/> USEPA Region 9 <input checked="" type="checkbox"/> California Department of Toxic Substances Control (DTSC) <input type="checkbox"/> California Regional Water Quality Control Board <input type="checkbox"/> Arizona Department of Environmental Quality <input type="checkbox"/> Nevada Department of Environmental Protection
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I (we) agree that the factual information I (we) have provided concerning the remedial activities overseen by the lead regulatory agency at this facility, as the basis for this assessment is, to the best of my (our) knowledge, accurate.

Completed by:

Name(s) (print)	Title	Signature and Date
Denise Tsuji	Unit Chief	 6/20/12
Barbara Cook	Branch Chief	 6/20/2012

CA 550 – REMEDY CONSTRUCTION

Event Code Name: CA550 - REMEDY CONSTRUCTION

Description: The event when the State or EPA acknowledges in writing that the RCRA facility has completed construction of a facility's remedy that was designed to achieve long-term protection of human health and the environment and that the remedy is fully functional as designed, whether or not final cleanup levels or other requirements have been achieved. Remedy construction may also acknowledge the event where no remedy is constructed. This event code applies when: 1) construction of the remedy(ies) have been completed, or 2) the Remedy Decision and Response to Comments or other appropriate decision document indicates that no physical construction of a remedy has been needed since site characterization activities began or no construction is necessary beyond what has been implemented prior to the remedy decision as in the case of stabilization measures. Remedy Construction for comprehensive remedies that address the entire facility (including off-site migration of contaminants) must be linked to the "Entire Facility" area. Phased or partial remedies are to be attached to specific areas of implementation and not to the "Entire Facility" area.

Status Codes: **NR – No Remedy Constructed;** This status code applies on the actual date of the CA400-Remedy Decision if no physical construction of a remedy has been needed since site characterization activities began. **RC - Remedy Constructed;** This status code applies after the actual date of the CA400 - Remedy Decision when either: 1) all necessary physical construction of the last corrective measure has been completed and all remedial systems are fully functional as designed, whether or not final cleanup levels or other requirements have been achieved, or 2) if all necessary physical construction of all remedial systems is fully functional as designed as a result of stabilization measures implemented prior to the actual date of the CA400 - Remedy Decision whether or not final cleanup levels or other requirements have been achieved.

Initiating Sources: 1) State or EPA document(s) (e.g. letter to facility, memorandum to file, etc.) acknowledging the completed construction of the final remedy in accordance with the requirements of permits, administrative orders, other agreements (including modification of existing instruments), or voluntary facility submissions containing equivalent information; or 2) a Remedy Decision and Response to Comments or other appropriate decision document indicating that no further physical construction of a remedy is needed.

Nationally Required: Yes

Scheduled Date: 1) The date the State or EPA is expected to acknowledge, in writing, that any necessary physical construction of the last corrective measure is complete and all remedial systems are fully functional as designed, whether or not final cleanup levels or other requirements have been achieved, or 2) the scheduled date for the remedy decision if no further physical construction of a remedy is expected to be needed.

Actual Date: 1) The date the State or EPA acknowledges, in writing, that any necessary physical construction of the last corrective measure is complete and all remedial systems are fully functional as designed, whether or not final cleanup levels or other requirements have been achieved, or 2) the date for the remedy decision if no further physical construction of a remedy is needed.

Guidance: 1. The Remedy Construction measure is an important milestone of Corrective Action progress designed to measure the progress of remedy implementation. The measure Completion with Controls or Completion Without Controls (CA900 and CA999) will likely be used to indicate the true status of completion at RCRA Corrective Action facilities. 2. Stabilization measures implemented prior to the Remedy Decision should be recorded under CA600 and CA650.

Responsible Agency: EPA or State